

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

DONALD RAY BROUSSARD (10)

No. 3:16-CR-479
ECF

GOVERNMENT’S UNOPPOSED MOTION TO CONTINUE SENTENCING

The United States of America, by and through the undersigned government counsel, moves this Honorable Court for an order continuing sentencing in this case and in support represents as follows:

1. The most recent scheduling order set sentencing on January 22, 2018.
2. Trial for Carlos Luis Venegas, et al, the co-defendants in this indictment, is set for February 26, 2018. Donald Ray Broussard is an anticipated witness in that trial, and his testimony is material to any sentence recommended and imposed by this Court.
3. The continuance will create no hardships on either party.
4. The undersigned has conferred with defense counsel, Jeffrey Grass, who has indicated he is not opposed to a continuance. Additionally, all counsel request an extension of due dates for responses to the Presentence Report and any addendum.

The government respectfully requests that this Honorable Court grant this Motion to Continue Sentencing and, thus, continue the sentencing of the defendant to a date after the conclusion of any trial or entry of plea of guilty for the co-defendants, including

Carlos Luis Venegas. The government also requests an extension of due dates for responses to the Presentence Report for this defendant, and any addendum.

Respectfully Submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

/s/ Myria Boehm

MYRIA BOEHM

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served by electronic filing on January 12, 2018, on Jeffrey Grass, 101 E. Park Blvd., Plano, Texas 75074, attorney for Donald Ray Broussard.

/s/ Myria Boehm
MYRIA BOEHM
Assistant United States Attorney